

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor

PROMESA
TITLE III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates only to HTA
Teresa Vizcarrondo Toro &
Adrián Mercado Jiménez
And their conjugal society**

**URGENT CONSENSUAL MOTION FOR EXTENSION OF DEADLINE REGARDING THE
PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY'S (1) OPPOSITION TO
(A) MOTION REQUESTING PAYMENT OF SEVERANCE DAMAGES [ECF NO. 23612],
AND (B) AMENDED PETITION REQUESTING PAYMENT OF SEVERANCE DAMAGES
[ECF NO. 24103], AND (2) REPLY TO RESPONSE FILED BY CLAIMANT ADRIÁN MERCADO
JIMÉNEZ [ECF NO. 21326] IN CONNECTION WITH THE FOUR HUNDRED FIFTY-FOURTH
OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO SATISFIED CLAIMS**

TO THE HONORABLE COURT:

COMES NOW, respondents, **ADRIÁN MERCADO JIMÉNEZ, TERESA
VIZCARRONDO TORO, and their CONJUGAL SOCIETY**, and very respectfully allege
and pray:

1. The herein appearing party received on April 24, 2023

**"Order Granting Urgent Consensual Motion for Extension of Deadlines
Regarding Motion Requesting Payment of Severance Damages".**
Exhibit 1

2. That on May 5, 2023, after various extensions, herein appearing party
received

**"The Puerto Rico Highways And Transportation Authority's (1)
Opposition To (A) Motion Requesting Payment Of Severance Damages
[Ecf No. 23612], And (B) Amended Petition Requesting Payment Of**

Severance Damages [Ecf No. 24103], And (2) Reply To Response Filed By Claimant Adrián Mercado Jiménez [Ecf No. 21326] In Connection With The Four Hundred Fifty-Fourth Omnibus Objection (Non-Substantive) To Satisfied Claims”.

3. Due to medical and logistical reasons out of the control of the undersigned, the deadline of May 12, 2023 cannot be met and a request is respectfully made to file the corresponding opposition on May 25, 2023.

4. Movants hereby certify that it has carefully examined the matter and concluded that there is a true need for the extension requested.

5. Accordingly with the consent of The Puerto Rico Highways and Transportation Authority (HTA), movant requests this Honorable Court that an extension to file the opposition until May 25, 2023 be granted. Exhibit 2

WHEREFORE, it is respectfully requested that this petition be GRANTED, and that the deadline for movants to file a reply to all oppositions and responses shall be May 25, 2023.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 10 day of May 2023.

s/**ADRIÁN MERCADO**

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I HEREBY CERTIFY that a copy of this motion was electronically filed by Movant, using the CM/EFC system, which will send notification to all the parties which have made an electronic appearance in this case.

Also, CERTIFY that copy of this motion has been sent by Certified and Return Receipt Mail on this date to: 1) **Clerk's Office**, United States District Court, 150 Chardon Ave., Federal Building, San Juan, Puerto Rico 00918; 2) **Attorneys for the Financial Oversight and Management Board as representative for the Debtor, Martin J. Bienenstock and Brian S. Rosen, PROSKAUER ROSE LLP**, Eleven Time Square, New York, New York 10036; 3) **Co-Attorneys for the Financial Oversight and Management Board as representative for the Debtor, Hermann D. Bauer, O'NEILL & BORGES LLC** 250 Muñoz Rivera Ave. Suite 800, San Juan, PR 00918-1813 4) **Counsel for the Creditors' Committee, PAUL HASTINGS LLP, Luis A. Despina**, 200 Park Avenue, New York, New York 10166; 5) **Commonwealth of Puerto Rico, Claims Processing Center c/o Kroll Restructuring Administration LLC**, 850 Third Avenue, Suite 412, Brooklyn, NY 11232; 6) **Bankruptcy Court Puerto Rico, Case MMLID: 168560 EPOC ID: 1703283007322**, José V. Toledo Federal Building, 300 Recinto St. S Ste 100, San Juan, PR 00901-1964.